

STATEMENT OF BASIS (AI No. 2993)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0070173 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: American Commercial Lines

Harahan Facility
PO Box 23206
Harahan, LA 70183

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Maxon Graham

DATE PREPARED: 16 April 2007

1. PERMIT STATUS

- A. Reason For Permit Action: Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.
- B. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A
EPA has not retained enforcement authority.
- C. LPDES permits – **LA0070173**
LPDES permit effective date: **1-01-2003**
LPDES permit expiration date: **12-31-2007**
- D. Date Application Received: 27 March 2007

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - Barge Cleaning Facility**

This is a barge cleaning facility that operates on the Mississippi River at mile marker 107, one (1) mile west of the Huey P. Long Bridge in Harahan, LA. The facility cleans open top and hopper barges that previously contained various commodities which are listed in Attachment I. All remaining commodity is removed from the barges prior to washing with water. The coal is recovered, placed on loaded coal barges for sale, and all other commodities are placed in dumpsters and removed from the facility by Waste Management for landfill disposal. Water from the river is then used to wash out any remaining residues. There is minor barge repair occurring at this facility, such as topside welding and occasional sandblasting.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 4491 - as per LAC33:IX.1319 Table I and SIC 4463. In

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Appendix A - Section IV (Relation of 1987 to 1977 Industries) of the Standard Industrial Classification Manual, the SIC code 4491 is equivalent to a previous SIC code of 4463

C. LOCATION - 5800 River Road, approximately one (1) mile W of the Huey P. Long Bridge in Harahan, Jefferson Parish
Latitude 29° 56' 47", Longitude 90° 10' 25"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: dry commodity barge washwater from hopper barges
Treatment: none
Location: at the point of discharge from the barge being washed adjacent to the office barge
Flow: intermittent
Discharge Route: directly to the Mississippi River, mile 107.

Outfall 002

Discharge Type: coal and coke barge washwater from hopper barges
Treatment: none
Location: at the point of discharge from the barge being washed adjacent to the office barge
Flow: intermittent
Discharge Route: directly to the Mississippi River, mile 107.

Outfall 003

Discharge Type: treated sanitary wastewater
Treatment: marine sanitation device
Location: at the point of discharge from the sanitation device on the office barge
Flow: 2000 gpd
Discharge Route: directly to the Mississippi River, mile 107.

Outfall 04A

Discharge Type: incoming ballast and void water from customer barges
Treatment: none
Location: at the point of discharge from the appropriate barge prior to combining with any other waters
Flow: intermittent
Discharge Route: directly to the Mississippi River, mile 107.

Outfall 04B

Discharge Type: ballast and void water from work, treatment, and spar/office barge
Treatment: none
Location: at the point of discharge from the appropriate barge prior to combining with any other waters
Flow: intermittent
Discharge Route: directly to the Mississippi River, mile 107.

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4. RECEIVING WATERS

STREAM - Mississippi River Mile Marker 107

BASIN AND SEGMENT - Mississippi River Basin, Segment 070301

DESIGNATED USES -

- a. primary contact recreation
- b. secondary contact recreation
- c. propagation of fish and wildlife
- d. drinking water supply

5. TMDL STATUS

The discharges from American Commercial Lines – Harahan Facility are to the Mississippi River, mile 107, subsegment 070301 of the Mississippi River Basin. Subsegment 070301 is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

CHANGES – This facility no longer does major barge repairs, so requirements for drydock BMPs have been removed.

7. COMPLIANCE HISTORY/COMMENTS

1. WQMD – there are no open enforcement actions for this facility as of April 16, 2007. There were 2 historic enforcement actions dated November 1985 and August 1991, however these actions were closed.

Inspections: CEI-6-1-01-KRC -06/01/01 – Effluent/Receiving waters were unsatisfactory due to the fact that 2 excursions were noted in May 1999. The excursions were for COD and Fecal Coliform. The company was no longer operating the barge repair operation as it had been taken over by National Maintenance and Repair of LA, Inc, however they were still operating under the permit for the Louisiana Dock Company. Also the facility had not sampled the sanitary outfall for a 10 month period from July 1999 to April 2000 which was in violation of permit requirements for that outfall. The company was submitting DMRs for a non-functioning outfall (Outfall 006) however, therefore following the permit requirements for that outfall.

2. DMR Review/Excursions – a DMR review was done for the period from January 2005 through March 2007. There were no excursions reported for the time period reviewed.

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8. EXISTING EFFLUENT LIMITS

Outfall 001 – BMP for dry commodity barge cleaning

Outfall 002 – intermittent discharge of coal and coke barge washwater

Parameter	STORET code	Monthly Average	Daily Maximum	Measurement Frequency	Sample Type
Flow – MGD	50050	Report	Report	1/week	Estimate
TSS (mg/L)	00530	Report	Report	1/month	Grab
COD (mg/L)	00340	250	400	1/week	Grab
pH (su)	00400	6.0 su (min)	9.0 su (max)	1/week	Grab

Outfall 003 – treated sanitary wastewater from barge fleet office

Parameter	STORET code	Monthly Average	Daily Maximum	Measurement Frequency	Sample Type
Flow – MGD	50050	---	Report	1/6 months	Estimate
BOD ₅ (mg/L)	00310	---	45	1/6 months	Grab
TSS (mg/L)	00530	---	45	1/6 months	Grab
Fecal Coliform (colonies/100 mL)	74055	---	400	1/6 months	Grab
pH (su)	00400	6.0 su (min)	9.0 su (max)	1/6 months	Grab

Outfall 04A – intermittent discharge of incoming ballast and void water from customer barges

Outfall 04B – intermittent discharge of maintenance ballast and void water

Parameter	STORET code	Monthly Average	Daily Maximum	Measurement Frequency	Sample Type
Flow – MGD	50050	Report	Report	1/week	Estimate
COD (mg/L)	00340	---	250	1/week	Grab
Oil & Grease (mg/L)	03582	---	15	1/week	Grab
pH (su)	00400	6.0 su (min)	9.0 su (max)	1/week	Grab

Outfall 04B – 1/month monitoring frequency

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 070301 of the Mississippi River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon and migratory waterfowl, which are listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse

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effect upon the Pallid Sturgeon and migratory waterfowl. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for American Commercial Lines

Outfall 001: dry commodity barge washwater from hopper barges

Based on BPJ and on permits for similar facilities, no effluent limitations are established for washwaters from barges previously containing dry commodities including all commodities listed in Attachment I. Best Management Practices (BMPs) for barge operations are listed in Part II.

Outfall 002: coal and coke barge washwater from hopper barges

<u>Pollutant</u>	<u>Limitation</u> Mthly Avg:Daily Max (mg/l)	<u>Reference</u>
Flow-MGD	Report:Report	LAC 33:IX.2701.I.1.b
COD	250:400	Similar Discharges; BPJ; previous permit
TSS	Report:Report	Similar Discharges; BPJ; previous permit
pH	6.0 - 9.0 s.u.	Similar Discharges; BPJ; previous permit

BPJ Best Professional Judgment
 s.u. standard units

Treatment: none

Monitoring Frequency: TSS shall be observed once per month and Flow, COD and pH shall be observed once per week at the point of discharge from the barge being washed.

Limits Justification: Limits and Monitoring Frequency are based on current guidance for similar discharges from other facilities.

Outfall 003: treated sanitary wastewater

<u>Pollutant</u>	<u>Limitation</u> Mthly Avg:Weekly Avg (mg/l)	<u>Reference</u>
Flow	Report:Report	LAC 33:IX.2701.I.1.b
BOD ₅	---:45	LAG530000, BPJ; previous permit
TSS	---:45	LAG530000, BPJ; previous permit
Fecal Coliform (colonies/100 mL)	---:400	LAG530000, BPJ; previous permit
pH	6.0 - 9.0 s.u.	LAG530000, BPJ; previous permit

BPJ Best Professional Judgment
 s.u. Standard Units

Treatment: Marine Sewage Treatment Plant

Monitoring Frequency: Flow, BOD₅, TSS, Fecal Coliform and pH shall be observed once per 6 months,

Limits Justification: Limits and Monitoring Frequency are based on LAG530000 and on current guidance for similar discharges from other industrial facilities.

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Outfall 04A: incoming ballast and void water from customer barges
Outfall 04B: maintenance ballast and void water

<u>Pollutant</u>	<u>Limitation</u> Mthly Avg:Daily Max (mg/l)	<u>Reference</u>
Flow-MGD	Report:Report	LAC 33:IX.2701.I.1.b
COD	---:250	Similar Discharges; BPJ; previous permit
Oil and Grease	---:15	Similar Discharges; BPJ; previous permit
pH	6.0 - 9.0 s.u.	Similar Discharges; BPJ; previous permit

BPJ Best Professional Judgment
 s.u. standard units

Treatment: none

Monitoring Frequency: Flow, COD, Oil & Grease and pH shall be observed once per week at the point of discharge from the incoming customer barge/vessel.

*The measurement frequency for Outfall 04B for the discharge of maintenance ballast and void water shall be 1/month whenever sampling is required.

Limits Justification: Limits and Monitoring Frequency are based on current guidance for similar discharges from other facilities.

This facility is not subject to Effluent Limitations Guidelines for Transportation Equipment Cleaning, 40 CFR Part 442, because, in accordance with 40 CFR 442.1.a, "this part applies to discharges resulting from cleaning the interior of tanks used to transport chemical, petroleum or food grade cargos." This facility does not clean tanks. Only open top hopper barges are cleaned.

Storm Water Pollution Prevention Plan (SWP3) Requirement

A SWP3 is required because in accordance with LAC 33:IX.2511.A.1.b, stormwater discharges that are associated with industrial activity shall be monitored. In accordance with LAC 33:IX.2511.B.14, SIC codes 3731 and 4491 are considered to be associated with industrial activity.

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ATTACHMENT 1
List of Commodities

Outfall 001

Grains, Food Additives and other Biological Feedstocks

Soybean Meal
Corn Gluten Feed Pellets
Corn Distiller Grain Meal
Beet Pulp Pellets
Soyhulls
Soyhull Pellets
Rice Bran
Peanut Meal
Corn
Soybeans
Rice
Oats
Fish Meal
Meat and Bone Meal
Wheat
Millet
Sorghum
Barley
Wheat Gluten

Briquetted Iron
Barytes
Sand
Fly Ash
Scrap Iron
Activated Alumina
Alumina Trihydrate
Cement
Ferrochrome
Ferromanganese
Ferrosilicon
Fluorspar
Gypsum
Iron Ore
Lime
Magnesite
Salt
Steel Products
Sugar
Wood Chips

Outfall 002

Coal and Coke Products: Coal, Metallurgical Coke, Pitch Petroleum Coke, Anode Butts